

**STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE UTILITIES BOARD**

---

**IN RE:**

**OFFICE OF CONSUMER ADVOCATE,**  
Petitioner,

**v.**

**INTERSTATE POWER AND LIGHT  
COMPANY,**  
Respondent

---

**Docket No. FCU-2016-0011**

**JOINT STATEMENT OF THE ISSUES**

In accordance with the procedural schedule established by the Iowa Utilities Board (Board) in its Order Granting Motion to Modify Procedural Schedule and Rescheduling Hearing, issued on November 9, 2016, Interstate Power and Light (IPL) and the Office of Consumer Advocate (OCA), jointly referred to as the “Parties”, submit the following statement describing the contested issues that require resolution in the above-captioned proceeding concerning OCA’s complaint against IPL related to estimated bills.

The Parties have made a good faith effort to accurately state the issues to be decided by the Board in this matter. However, this document should not be construed as an admission or as imposing any limitation with respect to any issues that may arise at hearing or that may be addressed in the Parties’ briefs.

**LIST OF ISSUES**

The Parties request that the Board decide the following issues with regard to OCA’s complaint against IPL related to estimated bills.

1. Whether, by issuing estimated bills in the summer and early fall of 2016, IPL violated Board rule 199 IAC 20.3(1)(a) which requires that all electricity sold by a utility shall be on the basis of meter measurement.

Positions of the Parties

OCA: Direct Testimonies of Keva Hibbert, Brian Turner, and the testimony of Kathy Harriott.

IPL: Direct Testimonies of Dee Brown, Shirley Stibb, Wendi Cigrand, Gregg Lawry, and the testimony of Kathy Harriott.

2. Whether, by issuing estimated bills in the summer and early fall of 2016, IPL violated Board rule 199 IAC 20.3(6) which provides “Readings of all meters used for determining charges and billings to customers shall be scheduled at least monthly and for the beginning and termination of service.... If an actual meter reading cannot be obtained, the utility may render an estimated bill without reading the meter or supplying a meter reading form to the customer. Only in unusual cases or when approval is obtained from the customer shall more than three consecutive estimated bills be rendered.”

Positions of the Parties

OCA: Direct Testimonies of Keva Hibbert, Brian Turner, and the testimony of Kathy Harriott.

IPL: Direct Testimonies of Dee Brown, Shirley Stibb, Wendi Cigrand, and Gregg Lawry, and the testimony of Kathy Harriott.

3. Whether, by issuing estimated bills in the summer and early fall of 2016, IPL violated Board rule 199 IAC 20.4(9) which requires:

Each customer shall be informed as promptly as possible following the reading of the customer's meter, on bill form or otherwise, of the following:

a. The reading of the meter at the beginning and at the end of the period for which the bill is rendered.

b. The dates on which the meter was read, at the beginning and end of the billing period.

\* \* \*

d. The applicable rate schedule, or identification of the applicable rate schedule.

e. The account balance brought forward and amount of each net charge for rate-schedule-priced utility service, sales tax, other taxes, late payment charge, and total amount currently due. In the case of prepayment meters, the amount of money collected shall be shown.

\* \* \*

g. A distinct marking to identify an estimated bill.

199 IAC 20.4(9).

#### Positions of the Parties

OCA: Direct Testimonies of Keva Hibbert, Brian Turner, and the testimony of Kathy Harriott.

IPL: Direct Testimonies of Dee Brown, Shirley Stibb, Wendi Cigrand, and Gregg Lawry, and the testimony of Kathy Harriott.

4. Whether, when responding to customer complaints in the summer and early fall of 2016, IPL violated Board rule 199 IAC 20.4(2) which requires "Each utility shall promptly and courteously resolve inquiries for information or complaints."

Positions of the Parties

OCA: Direct Testimonies of Keva Hibbert, Brian Turner, and the testimony of Kathy Harriott.

IPL: Direct Testimonies of Dee Brown, Shirley Stibb, Wendi Cigrand, and Gregg Lawry and the testimony of Kathy Harriott.

Whether, due to the above issues or due to the volume of consumer complaints related to estimated bills in the summer and early fall of 2016, IPL violated its obligation under Iowa Code § 476.3(1) (2015) to furnish reasonably adequate service at rates and charges in accordance with tariffs filed with the Board.

Positions of the Parties

OCA: Direct Testimonies of Keva Hibbert, Brian Turner, and the testimony of Kathy Harriott.

IPL: Direct Testimonies of Dee Brown, Shirley Stibb, Wendi Cigrand, and Gregg Lawry, and the testimony of Kathy Harriott.

5. Whether IPL has planned and implemented substantive changes that adequately address the causes of the higher number of estimated bills that were sent in 2016.

Positions of the Parties

OCA: Direct Testimonies of Keva Hibbert, Brian Turner, and the testimony of Kathy Harriott.

IPL: Direct Testimonies of Dee Brown, Shirley Stibb, Wendi Cigrand, and Gregg Lawry, and the testimony of Kathy Harriott.

**CONCURRENCE**

Counsel for all Parties to this proceeding represent that they concur in the above Joint Statement of the Issues.

Dated this 9<sup>th</sup> of December, 2016.

Respectfully submitted,

INTERSTATE POWER AND LIGHT  
COMPANY

*/s/ Samantha C. Norris*

---

Samantha C. Norris  
Senior Attorney  
200 First Street S.E.  
P.O. Box 351  
Cedar Rapids, IA 52406-0351  
Telephone: (319) 786-4236  
E-mail: [SamanthaNorris@alliantenergy.com](mailto:SamanthaNorris@alliantenergy.com)

OFFICE OF CONSUMER ADVOCATE

*/s/ Mark R. Schuling*

---

Mark R. Schuling  
Consumer Advocate  
1375 East Court Avenue  
Des Moines, IA 50319-0063  
Telephone: (515) 725-7200  
E-mail: [OCAService@oca.iowa.gov](mailto:OCAService@oca.iowa.gov)